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FROM THE DESK OF FORBES MERCY

July 24, 2017

The Honorable Ajit Pai, Chairman
The Honorable Mignon Clyburn, Commissioner
The Honorable Michael O'Rielly, Commissioner

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: GN Docket No. 12-354, RM-11778 and RM-11789 Amendment of the Commission's Rules
with Regard to Commercial Operations in the 3550-3650 MHz Band

Dear Chairman Pai, Commissioner Clyburn, and Commissioner O'Rielly, Marlene H. Dortch,
Secretary

My comments will be short and not nearly as graciously written by our trade group and other capable legal minds. A summation of my company's comments is that when you work on something for two years, organize a process and agree upon a plan, the guy who jumps in at the last moment wanting to change everything is never given credibility. Sadly this "guy" has lots of friends in high places so once again long hours of effort hedge on a last-minute challenge to small business from the corporate behemoths who now feel that all spectrum should be theirs and competition should assimilate.

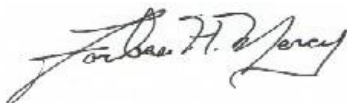
I am a WISP and having started as a Dial-up Internet service I introduced the local Internet to my area in 1994 and since 2001 for fixed wireless. Some of you may recall my 6 years of service to the WISPA board of which I have completed my term and moved back to concentrating on my business. We serve the Yakima Valley in Washington State with a little over 100,000 citizens and the lowest per capita income in our otherwise wealthy state. We are mostly agricultural lacking large manufacturing jobs as our western neighbors can boast. My customer base approaches 2000 wireless customers and we have recently purchased a rural cable system to try to reach those to whom radios cannot.

While I am certainly understanding of using space whether it be physical or electronic for the greater good of profit and unified use by corporations to provide a service to the public, there is also the need for public space. CBRS was originated in order to better use the smaller 3650 space in which we have used for years in our service area.

The hope was that we could employ affordable technologies to both make spectrum use more efficient but also to allow a greater throughput for rural areas. We've watched the popular Cell companies continue to buy and hoard spectrum. The hard-fought shared spectrum has been great but every single request small business WISP's now make are overshadowed by an unsubstantiated ask from those cell companies to give them everything possible. They aren't using what they have but now the drive is to deprive communities the abilities to offer a choice via existing WISP's with a push so that there is no new spectrum available. The CBRS wasn't even set up as a cell provider frequency but now this last-minute push by CTIA is to just grab it and turn it into unpurchased cell space. So much work and research has been done to develop these standards to be thrown out at the last minute in a land grab meant to deny ongoing demands of rural customers.

This situation reminds me of a park we were trying to put in place for the public's use, years of environmental reviews, public meetings, permit processes and right about when it's to be approved a big Box store jumps in and says they want it. They don't fit there, the zoning isn't right, nothing is right about it but there they are a powerhouse against a community oriented group with a thoughtful plan. I'm hoping the Commissioners can recognize this for what it is, not an improvement to the space as it's been planned, just a land grab in the electronic sense. How will we ever get manufacturers to take us seriously if we ask them to engineer something under an understanding we have with the FCC and Congress if the government just changes its mind with no new revenue cutting out the Small businesses to pay back a political favor that hurts so many and that so many in Congress are committed to protecting. I urge you to stay the course on CBRS and push the last-minute entrants aside as greedy obstructionists not valid contributors to the process.

Thank you,

A handwritten signature in dark ink, appearing to read "Forbes H. Mercy". The signature is fluid and cursive, with the first name "Forbes" being more prominent.

Forbes Mercy

President – Washington Broadband, Inc.